

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**REENA S. MATHEW,**

**Plaintiff,**

**v.**

**SANTANDER CONSUMER USA INC.,**

**Defendant.**

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**CIVIL ACTION NO. 3:23-CV-01494-N**

**DEFENDANT’S LIST OF TRIAL WITNESSES**

**TO THE CHIEF UNITED STATES DISTRICT JUDGE DAVID C. GODBEY:**

Pursuant to the Court’s Order Resetting Trial [Doc. No. 31], Defendant Santander Consumer USA Inc. (“Santander”) submits the following List of Trial Witnesses. Whether a witness will ultimately be called to testify by Santander depends on the Court’s pretrial and trial rulings, the evidence offered by Plaintiff Reena Mathew (“Mathew”), and other developments of the trial. Additionally, Santander reserves the right to call as a witness any person: (1) listed as a witness by Ms. Mathew; or (2) for impeachment as authorized by Federal Rule of Civil Procedure 26(a)(3)(A) and Local Rule 26.2(b).

- (1) Reena Mathew  
1355 Valley Vista Dr.  
Irving, TX 75063  
c/o Donald E. Uloth  
Donald E. Uloth, P.C.  
18208 Preston Road, Suite D-9 # 261  
Dallas, Texas 75248

Ms. Mathew is the Plaintiff in this case. Ms. Mathew is expected to testify regarding her employment at Santander, including her job duties and responsibilities, work performance, and termination from Santander. Ms. Mathew is also expected to offer testimony regarding her allegations of sex/pregnancy discrimination and retaliation and her alleged damages. Assuming the Plaintiff calls Ms. Mathew to testify, Santander’s examination of Ms. Mathew will be

limited to cross-examination and re-cross examination. Should Plaintiff not call Ms. Mathew to testify, Santander expects Ms. Mathew's direct examination will last approximately 3 hours.

- (2) Yessica Perez (formerly Yessica Adriano)  
560 Lockton Lane  
Prosper, Texas 75078

Ms. Perez was Ms. Mathew's supervisor from mid-2015 through the time of her termination. Ms. Perez is expected to testify regarding Ms. Mathew's employment at Santander, including her job duties and responsibilities, poor work performance, and termination from Santander. Ms. Perez is also expected to offer testimony regarding Ms. Mathew's allegations of sex/pregnancy discrimination and retaliation and how the real reason for Ms. Mathew being placed on a PIP and ultimately being terminated was a result of Ms. Mathew's poor job performance. Ms. Perez is further expected to testify regarding Santander's anti-discrimination policies and regarding Santander's treatment of pregnant employees at Santander. Santander expects Ms. Perez's direct examination will last approximately 2 hours.

- (3) Sabrina Boyd  
HRBP  
c/o Monte K. Hurst  
Hallett & Perrin, P.C.  
1445 Ross Avenue, Suite 2400  
Dallas, Texas 75202

Ms. Boyd is a human resources business partner that worked with Ms. Mathew during her employment and ultimately was promoted into Ms. Mathew's position when Ms. Mathew was terminated. Ms. Boyd is expected to testify regarding Ms. Mathew's employment at Santander, including her job duties and responsibilities, poor work performance, and termination from Santander. Ms. Perez is also expected to offer testimony regarding Ms. Mathew's allegations of sex/pregnancy discrimination and retaliation and how the real reason for Ms. Mathew being placed on a PIP and ultimately being terminated was a result of Ms. Mathew's poor job performance. Ms. Boyd is further expected to testify regarding Santander's anti-discrimination policies. Ms. Boyd, who was pregnant while at Santander and had a young child at the time she replaced Ms. Mathew, is also expected to testify regarding Santander's treatment of pregnant employees at Santander. Santander expects Ms. Boyd's direct examination will last approximately 1 hour.

- (4) Angelina Hulum  
Human Resources Manager  
Address Unknown

Ms. Hullum was Ms. Mathew's supervisor from 2011 through mid-2015. Ms. Hullum is expected to testify regarding Ms. Mathew's employment at Santander, including her job duties and responsibilities, poor work performance and termination from Santander. Ms. Hullum is also expected to offer testimony regarding Ms. Mathew's allegations of sex/pregnancy discrimination and retaliation and how the real reason for Ms. Mathew being placed on a PIP and ultimately being terminated was a result of Ms. Mathew's poor job performance. Ms. Hullum is further expected to testify regarding Santander's anti-discrimination policies and regarding Santander's treatment of pregnant employees at Santander. Santander expects Ms. Hullum's direct examination will last approximately 1 hour.

- (5) Stephanie Elad  
Human Resources Director  
15251 Camden Lane  
Frisco, Texas 75035

Ms. Elad was the director over Ms. Perez and Ms. Mathew at the time of Ms. Mathew's termination. Ms. Elad is expected to testify regarding Ms. Mathew's employment at Santander, including her job duties and responsibilities, poor work performance and termination from Santander. Ms. Elad is also expected to offer testimony regarding Ms. Mathew's allegations of sex/pregnancy discrimination and retaliation and how the real reason for Ms. Mathew being placed on a PIP and ultimately being terminated was a result of Ms. Mathew's poor job performance. Ms. Elad is further expected to testify regarding Santander's anti-discrimination policies and regarding Santander's treatment of pregnant employees at Santander. Santander expects Ms. Elad's direct examination will last approximately 1 hour.

- (6) Stephen Shaffer  
Vice President Human Resources Business Partnership  
Address Unknown

Mr. Shaffer was the vice president of human resources over Ms. Elad, Ms. Perez, and Ms. Mathew at the time of Ms. Mathew's termination. Mr. Shaffer is expected to testify regarding Ms. Mathew's employment at Santander, including her job duties and responsibilities, poor work performance and termination from Santander. Mr. Shaffer is also expected to offer testimony regarding Ms. Mathew's allegations of sex/pregnancy discrimination and retaliation and how the real reason for Ms. Mathew being placed on a PIP and ultimately being terminated was a result of Ms. Mathew's poor job performance. Mr. Shaffer is further expected to testify regarding Santander's anti-discrimination policies and regarding Santander's treatment of pregnant employees at Santander. Santander expects Mr. Shaffer's direct examination will last approximately 1 hour.

- (7) Pamela Blackburn  
Executive Vice President of Human Resources  
Address Unknown

Ms. Blackburn was the executive vice president of human resources over Mr. Shaffer, Ms. Elad, Ms. Perez, and Ms. Mathew at the time of Ms. Mathew's termination. Ms. Blackburn is expected to testify regarding Ms. Mathew's employment at Santander, including her job duties and responsibilities, poor work performance and termination from Santander. Ms. Blackburn is also expected to offer testimony regarding Ms. Mathew's allegations of sex/pregnancy discrimination and retaliation and how the real reason for Ms. Mathew being placed on a PIP and ultimately being terminated was a result of Ms. Mathew's poor job performance. Ms. Blackburn is further expected to testify regarding Santander's anti-discrimination policies and regarding Santander's treatment of pregnant employees at Santander. Santander expects Ms. Blackburn's direct examination will last approximately 30 minutes.

- (8) Whitney Andres  
HRBP  
c/o Monte K. Hurst  
Hallett & Perrin, P.C.  
1445 Ross Avenue, Suite 2400  
Dallas, Texas 75202

Ms. Andres is a human resources business partner that worked with Ms. Mathew during her employment. Ms. Andres is expected to testify regarding Ms. Mathew's job performance during her employment with Santander and the nondiscriminatory reasons for her termination. Ms. Andres is further expected to testify regarding Santander's anti-discrimination policies and has knowledge regarding Santander's treatment of pregnant employees at Santander. Santander expects Ms. Andres's direct examination will last approximately 30 minutes.

- (9) Tina Mohan  
HRBP  
7010 Statford Drive  
Rowlett, Texas 75089

Ms. Mohan was a human resources business partner that worked with Ms. Mathew during her employment. Ms. Mohan is expected to testify regarding Ms. Mathew's job performance during her employment with Santander and the nondiscriminatory reasons for her termination. Ms. Mohan is further expected to testify regarding Santander's anti-discrimination policies and has knowledge regarding Santander's treatment of pregnant employees at Santander. Santander expects Ms. Mohan's direct examination will last approximately 30 minutes.

- (10) Nicole Prior  
HRBP  
c/o Monte K. Hurst  
Hallett & Perrin, P.C.  
1445 Ross Avenue, Suite 2400  
Dallas, Texas 75202

Ms. Prior is a human resources business partner that worked with Ms. Mathew during her employment. Ms. Prior is expected to testify regarding Ms. Mathew's job performance during her employment with Santander and the nondiscriminatory reasons for her termination. Ms. Prior is further expected to testify regarding Santander's anti-discrimination policies and has knowledge regarding Santander's treatment of pregnant employees at Santander. Santander expects Ms. Prior's direct examination will last approximately 30 minutes.

- (11) Fatma Rizvan  
HRBP  
537 Seminole Trail  
Murphy, Texas 75094

Ms. Rizvan was a human resources business partner that worked with Ms. Mathew during her employment. Ms. Rizvan is expected to testify regarding Ms. Mathew's job performance during her employment with Santander and the nondiscriminatory reasons for her termination. Ms. Rizvan is further expected to testify regarding Santander's anti-discrimination policies and has knowledge regarding Santander's treatment of pregnant employees at Santander. Santander expects Ms. Rizvan's direct examination will last approximately 30 minutes.

- (12) Christina Stout  
HRBP  
5601 Andalusia Trail  
Arlington, Texas 76017

Ms. Stout is a human resources business partner that worked with Ms. Mathew during her employment. Ms. Stout is expected to testify regarding Ms. Mathew's job performance during her employment with Santander and the nondiscriminatory reasons for her termination. Ms. Stout is further expected to testify regarding Santander's anti-discrimination policies and has knowledge regarding Santander's treatment of pregnant employees at Santander. Santander expects Ms. Stout's direct examination will last approximately 30 minutes.

- (13) Monte K. Hurst  
HALLETT & PERRIN, P.C.  
1445 Ross Avenue, Suite 2400  
Dallas, Texas 75202

Mr. Hurst is a Shareholder with HALLETT & PERRIN, P.C. and serves as lead counsel for Santander in this case. He has practiced law for over 24 years, with an emphasis on employment matters. He is Board-Certified in Labor & Employment Law by the Texas Board of Legal Specialization. He can be expected to present expert testimony regarding his knowledge and experience in employment and commercial litigation, his familiarity with what is a reasonable and customary billing rate for an attorney in this area with his knowledge and experience, his hourly rate in this case, and the time that he has expended in legal work on this case and the time that he has directed to be expended in legal work on this case. Defendant anticipates that direct examination of Mr. Hurst will last one hour.

- (14) Any witnesses called by Plaintiff, including experts.

Respectfully submitted,

**HALLETT & PERRIN, P.C.**  
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*Counsel for Defendant, Santander Consumer USA Inc.*

**CERTIFICATE OF SERVICE**

On December 6, 2024, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I have served Plaintiff's counsel as follows electronically or by another manner authorized by Rule 5(b)(2) of the Federal Rules of Civil Procedure:

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